

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
NORTHERN DIVISION

ISSAH “ISIAH” SMITH,

Plaintiff,

V.

MANAGEMENT & TRAINING  
CORPORATION,

Defendant.

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CIVIL ACTION NO. 4:15-cv-236-O

**PLAINTIFF ISIAH SMITH’S MOTION FOR  
DISMISSAL WITHOUT PREJUDICE**

TO THE HONORABLE COURT:

Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Isaiah Smith, by and through his undersigned attorney, files this Motion for Dismissal without Prejudice. Mr. Smith respectfully requests that his action against Defendant Management & Training Corporation and all claims against Management & Training Corporation contained in this matter, should be dismissed without prejudice. The parties stipulates that they shall be responsible for their own respective costs and attorneys’ fees incurred as a result of this action.

Respectfully submitted,

**/S/Trang Q. Tran**

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that he conferred with counsel for Defendant on October 28, 2015. Defendant does not oppose Plaintiff's Motion for Dismissal Without Prejudice.

/s/ Trang Q. Tran

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Trang Q. Tran

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served on October 29, 2015, by the means below on the persons identified below.

**VIA FAX AND ELECTRONIC MAIL**

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